

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

**BRITTNEY GOBBLE PHOTOGRAPHY,
LLC,**

Plaintiff,

v.

**SINCLAIR BROADCAST GROUP, INC.,
et al.,**

*Defendants/Third-Party
Plaintiffs,*

v.

**USA ENTERTAINMENT NEWS, INC.
d/b/a “WENN” and “WORLD
ENTERTAINMENT NEWS NETWORK”,**

Third-Party Defendant.

Case No. 1:18-cv-03403-SAG (Lead Case)

Case No. 1:18-cv-03384-SAG

Case No. 1:19-cv-00559-SAG

Case No. 1:19-cv-00606-SAG

JOINT STATUS REPORT

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Plaintiff Brittney Gobble Photography, LLC, and Defendants Sinclair Broadcasting Group, Inc., *et al.*, pursuant to the Court’s November 25, 2019 and January 9, 2020 Orders, ECF 79 and 106, file this joint status report to the Court and state as follows:

1. On January 9, 2020, the parties participated in private mediation with Theo K. Cheng, Esq. in New York, New York. No resolution was reached.
2. On January 14, 2020, counsel for the parties conferred regarding outstanding discovery issues and the contents of this status report.
3. There are three depositions remaining to be scheduled. One of a fact witness, Amanda Ota, and two of Defendants’ expert witnesses. The parties hope to complete these depositions by the end of February 2020.

4. Since the mediation was unsuccessful, the parties have resumed their discussions to narrow the scope of the production of electronically stored information by Defendants. See ECF 75 (November 14, 2019 Joint Status Report). Once narrowed, Defendants will be able to advise Plaintiff how much time Defendants will need to complete their production.

5. Counsel for Plaintiff has informed counsel for Defendants of its intention to file a Second Amended Complaint. The parties have agreed that Plaintiff will send Defendants a redlined version of the complaint in an attempt to secure Defendants' consent and avoid motion practice. If Defendants' consent is not forthcoming, Plaintiff will seek leave of Court to file the Second Amended Complaint.

6. Defendant has requested that Plaintiff determine if Plaintiff can produce documents reflecting the photographs that Brittney Gobble previously displayed on the website lykoicat.com.

7. Plaintiff's motions to strike regarding Defendants' 30(b)(6) witnesses' errata sheets—ECF 73, 74, 76—are fully briefed. Plaintiff's reply in support of its Motion for Sanctions for the Spoliation of Evidence, ECF 96, is due on January 22, 2020.

Dated: January 15, 2020

Respectfully submitted,

By: /s/ Thomas P. Burke Jr.
Thomas P. Burke Jr.

C. Justin Brown
Maryland State Bar No. 28110
brown@cjbrownlaw.com
Brown Law Firm
1 N. Charles St., Suite 1301
Baltimore, Maryland 21201
Telephone: (410) 244-5444

C. Dale Quisenberry (admitted *pro hac vice*)
Texas State Bar No. 24005040
dale@quisenberrylaw.com
Quisenberry Law PLLC
13910 Champion Forest Drive, Suite 203
Houston, Texas 77069
Telephone: (832) 680-5000

Robert E. Allen (admitted *pro hac vice*)
Cal State Bar No. 166589
rallen@glaserweil.com
Thomas P. Burke Jr. (admitted *pro hac vice*)
Cal State Bar No. 288261
tburke@glaserweil.com
Glaser Weil Fink Howard Avchen & Shapiro LLP
10250 Constellation Blvd., 19th Fl.
Los Angeles, CA 90067
Telephone: (310) 282-6280

Attorneys for Plaintiff

By: /s/ Scott H. Marder
Scott H. Marder
(signed by Thomas P. Burke Jr. with
permission of Scott H. Marder)

Margaret L. Argent (Bar No. 06132)
margent@tandllaw.com
Scott H. Marder (Bar No. 28789)
SHMarder@tandllaw.com
Thomas & Libowitz, P.A.
100 Light Street, Suite 1100
Baltimore, Maryland 21202
Tel: (410) 752-2468
Fax: (410) 752-0979

Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 15th day of January 2020, a copy of the foregoing Joint Status Report was filed electronically. Notice of the filing will be sent to all parties who have appeared by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Thomas P. Burke Jr.

Thomas P. Burke Jr.